1	UNITED STATES DISTRICT COURT				
2	FOR THE DISTRICT OF NEVADA				
3	-000-				
4					
5	PETER DELVECCHIA, et al.,)) Civil No.:				
6	Plaintiff,) 2:19-CV-01322-KJD-NJK				
7	v.)				
8	FRONTIER AIRLINES, INC.,) et al.,)				
9	Defendants.				
10)				
11					
12					
13					
14	VIDEOTAPED DEPOSITION OF CHELSIE SAKURADA				
15	Taken on December 3, 2109				
16	at 9:54 a.m.				
17					
18					
19	ADVANCED REPORTING SOLUTIONS 159 West Broadway				
20	Broadway Lofts, Suite 100 Salt Lake City, Utah 84101				
21	bare have crey, ocan offor				
22					
23					
24	REPORTED BY: Michelle Mallonee, RPR, CSR				
25					



1	you hadn't seen before, right?	11:11:09
2	A. Yeah.	11:11:12
3	Q. And then for the rest of the flight, you're	11:11:12
4	going to do surveillance on that lady?	11:11:14
5	A. No, because her pink hat didn't didn't she	11:11:17
6	didn't it had nothing to do with anybody else. I I	11:11:22
7	guess the the concept that we were looking we are	11:11:26
8	always trying to look for trafficking, I guess. And	11:11:29
9	that's something that we always look for.	11:11:32
10	Q. Well, now we've gone from there wasn't a risk to	11:11:37
11	safety, it wasn't all that concerning, to trafficking.	11:11:43
12	So let's talk about that.	11:11:48
13	Why first of all, does the company instruct	11:11:49
14	you to look for trafficking?	11:11:57
15	A. We have topics about it. I mean, there's	11:11:59
16	sometimes there's newsletters that are sent out, or just	11:12:03
17	topics that are sent out in email about the subject. And	11:12:08
18	we're all aware of it as flight attendants.	11:12:12
19	Q. All right. When you say "are sent out," you	11:12:17
20	mean sent out by Frontier to its employees?	11:12:19
21	A. Yes.	11:12:23
22	Q. And how often have you received these things?	11:12:23
23	A. Only a handful of times, maybe two, three.	11:12:27
24	Q. Two times you received emails and/or newsletters	11:12:31
25	about trafficking?	11:12:35
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1	Α.	Yes.	11:12:37
2	Q.	And when you say "trafficking," what	11:12:37
3	specific	ally do you mean?	11:12:39
4	A.	It's mostly newsletters about other instances	11:12:41
5	that hav	e happened, like, on different flights and what	11:12:45
6	to look	out for. And one of the things to look out for	11:12:47
7	is a kid	that doesn't answer for himself.	11:12:51
8	Q.	And does that specifically include a child	11:12:57
9	travelin	g with his parent	11:13:00
10	Α.	Umm-hmm, yes.	11:13:02
11	Q.	who doesn't answer for himself?	11:13:03
12	Α.	Correct.	11:13:05
13	Q.	And this is because of what Frontier has told	11:13:06
14	you?		11:13:09
15	Α.	Yes.	11:13:09
16	Q.	Okay. So you felt that by labeling Peter and	11:13:09
17	A.D. as	a situation to keep an eye on that you were	11:13:17
18	followin	g Frontier's policies?	11:13:23
19	Α.	Absolutely.	11:13:25
20	Q.	Okay. Now, again, these couple of items that	11:13:26
21	you've r	eceived from your employer about trafficking,	11:13:34
22	what did	you understand "trafficking" to mean?	11:13:36
23	Α.	To me, it is some child that is with an adult	11:13:40
24	that the	y're not that they're not supposed to be with.	11:13:46
25	They're	not their parents. They're not their person	11:13:48



1	that's o	ver them, the guardian. That they are kept	11:13:56
2	silent f	rom this person that is taking them from one	11:14:01
3	place to	another, and and they're not supposed to be.	11:14:04
4	Q.	And you believe, based on what Anna Bond told	11:14:07
5	you, tha	t Peter was keeping A.D. silent?	11:14:13
6	A.	Yes.	11:14:18
7	Q.	And you believe that Peter took the middle seat	11:14:18
8	specific	ally so that A.D. couldn't interact with someone	11:14:23
9	seated b	eside him?	11:14:26
10	A.	Yes. It was something to continue looking out	11:14:27
11	for, yes	•	11:14:30
12	Q.	Now, when they were in the exit row, where were	11:14:31
13	Peter an	d A.D. seated?	11:14:36
14	A.	Peter was in the middle, A.D. was seated in	11:14:39
15	the t	he D seat, which is in the aisle. So there was	11:14:41
16	someone	across the aisle from him, yes.	11:14:45
17	Q.	There was someone next to him?	11:14:47
18	A.	The father was next to him, and there was an	11:14:49
19	aisle, a	nd then there was another person on the other	11:14:51
20	side.		11:14:53
21	Q.	All right. All right. So presumably, A.D.	11:14:54
22	could ha	ve spoken with that person across the aisle,	11:14:56
23	right?		11:14:58
24	A.	Correct.	11:14:59
25	Q.	It's not that far?	11:14:59



1	Α.	No, it's not.	11:15:00
2	Q.	Okay. So, but but in this case, you, I	11:15:02
3	believe,	said you should be on the look out for someone	11:15:07
4	who shou	ldn't a child who shouldn't be with the	11:15:10
5	guardian		11:15:13
6	Α.	Yeah.	11:15:15
7	Q.	Okay. And in this case, you had a child that	11:15:16
8	was a di:	fferent race from the guardian, right?	11:15:19
9	Α.	Umm-hmm.	11:15:23
10	Q.	And that was unusual to you?	11:15:24
11	Α.	No.	11:15:25
12	Q.	It was not unusual to you?	11:15:26
13	Α.	Not to me, no.	11:15:28
14	Q.	Did not raise or heighten your concerns about	11:15:29
15	whether o	or not this child should be with this adult?	11:15:32
16	Α.	No.	11:15:35
17	Q.	So the only thing that heightened your concerns	11:15:35
18	were tha	t Anna Bond said that the father answered for the	11:15:38
19	child?		11:15:43
20	Α.	Anna Anna Bond was uncomfortable, and it made	11:15:43
21	us all j	ust, yeah, keep an eye out, absolutely.	11:15:47
22	Q.	Uncomfortable is kind of a general concept,	11:15:50
23	isn't it	?	11:15:53
24	Α.	Yeah, it's very general. That's why we kept an	11:15:53
25	eye out.		11:15:57
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1	Q. Didn't you feel an obligation to question Anna	11:15:58
2	Bond more about why she was uncomfortable?	11:16:00
3	A. No, because there are situations that arise all	11:16:04
4	the time that could make us feel uncomfortable for just a	11:16:07
5	moment, and then, you know, nothing happens. But we	11:16:11
6	still keep an eye out, especially when it's a kid's	11:16:13
7	safety.	11:16:18
8	Q. And you felt that A.D. was in an unsafe	11:16:19
9	position?	11:16:21
10	A. I would say that he wasn't I I didn't feel	11:16:22
11	that he was unsafe at that time, no.	11:16:27
12	Q. Okay. Now, let's get back to the concept of	11:16:29
13	trafficking because it appears your employer is intent on	11:16:34
14	educating all of you flight attendants on this concept of	11:16:38
15	trafficking. So I want to be clear about what you	11:16:43
16	understand trafficking to be.	
17	Trafficking connotes taking somebody from one	11:16:48
18	place on another; does it not?	11:16:52
19	A. Yes.	11:16:53
20	Q. And for what reason?	11:16:54
21	A. I don't know. I mean, I've heard of people	11:17:03
22	selling off children or just illegal activity, but not	11:17:05
23	anything specifically.	11:17:11
24	Q. Did you feel in this instance, based on what	11:17:13
25	Anna Bond had told you and what you had seen Peter doing	11:17:15



1	with A.D.'s face, that Peter was going to sell A.D. in	11:17:22	
2	Las Vegas?		
3	A. I have no idea.	11:17:27	
4	Q. You have no idea?	11:17:27	
5	A. No.	11:17:28	
6	Q. Okay.	11:17:29	
7	A. My my my job is to to just protect	11:17:29	
8	everyone on the plane. I don't know what happens on the	11:17:35	
9	ground.	11:17:37	
10	Q. Okay. Your job is to make sure that they are	11:17:38	
11	safe from risks that are inherent in the operation of	11:17:41	
12	airplanes?		
13	A. Correct, yeah.	11:17:48	
14	Q. And suspicions of trafficking really doesn't	11:17:48	
15	involve anything about the operation of airplanes, does 1	11:17:54	
16	it? 1	11:17:58	
17	A. Well, that that's up to the captain. The	11:17:58	
18	captain flies the plane. I am solely for those	11:18:00	
19	passengers 100 percent. Even in an emergency, I'm the	11:18:04	
20	one who gets those passengers off.	11:18:08	
21	Q. Right. You're the one that makes sure that they	11:18:09	
22	get to the exits and they get safely out the exits, that	11:18:12	
23	they are wearing their life vests, and that they don't	11:18:15	
24	inflate them inside because they'll stick to the ceiling. 1	11:18:18	
25	And it's something they never tell you, by the way.	11:18:21	



A. They don't until it's an emergency. They really	11:18:25
don't. I don't think they	11:18:27
Q. It's not very funny because there's several	11:18:30
people that died because of that.	11:18:35
And you are responsible for making sure that	11:18:36
carts don't run into people's feet and legs and elbows	11:18:38
A. Yes.	11:18:43
Q right?	11:18:43
But I'm curious where in your duties all of a	11:18:44
sudden you became in charge of making sure that people	11:18:47
aren't quote, unquote, trafficked?	11:18:50
A. I mean, if the safety of the child. The	11:18:56
safety of the passenger. I mean, we also make sure that	11:19:00
this drunk person isn't going to sit on this other drunk	11:19:03
person, or we are yeah. We're there for them in	11:19:07
all ways. I mean, verbally, physically, in every way. I	11:19:13
mean, if two people were starting to yell at each other,	11:19:20
I would get involved in that, too, and separate them,	11:19:22
too.	11:19:25
Q. If you thought a child was being trafficked and	11:19:26
the child was 12 years old, wouldn't you find a way to	11:19:29
ask the child if he was safe?	11:19:34
A. By separation, yes.	11:19:38
Q. All right.	11:19:40
A. You have to get them separated by passing them a	11:19:41
	don't. I don't think they Q. It's not very funny because there's several people that died because of that. And you are responsible for making sure that carts don't run into people's feet and legs and elbows A. Yes. Q right? But I'm curious where in your duties all of a sudden you became in charge of making sure that people aren't quote, unquote, trafficked? A. I mean, if the safety of the child. The safety of the passenger. I mean, we also make sure that this drunk person isn't going to sit on this other drunk person, or we are yeah. We're there for them in all ways. I mean, verbally, physically, in every way. I mean, if two people were starting to yell at each other, I would get involved in that, too, and separate them, too. Q. If you thought a child was being trafficked and the child was 12 years old, wouldn't you find a way to ask the child if he was safe? A. By separation, yes. Q. All right.



1	note and having them come to the bathroom, or signaling	11:19:44
2	for them to go to the restroom and then ask them there,	11:19:48
3	yes.	11:19:51
4	Q. Did you do either of those things with respect	11:19:51
5	to A.D.?	11:19:54
6	A. No, because until no no, I didn't.	11:19:55
7	Q. All right. What was the next thing that you	11:20:01
8	recall occurring? And I I'll remind you that we're up	11:20:03
9	to the point where you have seen Peter touching A.D.'s	11:20:07
10	face.	11:20:14
11	A. I went up to the front, and then all of us	11:20:15
12	congregated to the front to talk about this situation.	11:20:20
13	And we all equally felt that it was just something we	11:20:22
14	needed to bring up to the captain's attention.	11:20:25
15	Q. So, and when you say "we all," you mean A, B, C,	11:20:27
16	and D?	11:20:30
17	A. Correct.	11:20:31
18	Q. Okay.	11:20:33
19	A. We yes. We don't usually go up to the	11:20:33
20	captain unless we are all on the same page.	11:20:36
21	Q. All right. So that is yourself and Anna Bond?	11:20:39
22	A. (No audible response.)	11:20:42
23	Q. You have to say "yes."	11:20:43
24	A. Oh, yes.	11:20:44
25	Q. Yes? Okay.	11:20:45



1	Α.	Yes.	11:20:46
2	Q.	And Amanda Nichol?	11:20:46
3	Α.	Yes.	11:20:49
4	Q.	And Scott Warren?	11:20:50
5	Α.	Correct.	11:20:51
6	Q.	And you're all meeting where, in the in the	11:20:51
7	aft gal		11:20:52
8	Α.	No, forward.	11:20:52
9	Q.	or, I'm sorry, the the fore gal?	11:20:52
10	Α.	Forward gal, yes.	11:20:54
11	Q.	Okay. And what specifically was said in that	11:20:57
12	meeting?		11:20:59
13	Α.	I came back up to the front and said I, as well,	11:21:03
14	saw the	the man touching the little boy's face. I	11:21:07
15	don't th	ink we ever you can't assume a relationship	11:21:12
16	like that	t. I don't I don't know if I ever assumed	11:21:17
17	that it was the father. I I don't remember. But I		11:21:20
18	I probably said that the man was touching the young		
19	man's fa	ce the boy's face. And and I said, "I	11:21:27
20	don't kno	ow. I just don't have a good feeling about it."	11:21:30
21	And every	yone else was, like, "Me, either." And so	11:21:33
22	Q.	Well, when you say "everybody," everybody at	11:21:37
23	this poin	nt, all four flight attendants, are up at the	11:21:39
24	front, r	ight?	11:21:41
25	Α.	Umm-hmm. Umm-hmm.	11:21:41

